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*Counsel for Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA  
MUNIZ, ELIZA CAMBAY, SAL  
CATALDO, EMIR GOENAGA, JULIAN  
SANTIAGO, HAROLD NYANJOM,  
KELLIE NYANJOM, and SUSAN LYNN  
HARVEY, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

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Case No. 3:20-CV-04688-RS

**JOINT STIPULATION AND [PROPOSED]  
ORDER PERMITTING PLAINTIFFS TO  
FILE THE UNREDACTED VERSION OF  
THE THIRD AMENDED COMPLAINT**

Judge: The Honorable Richard Seeborg

1 Pursuant to Civil Local Rule 7-12, this joint stipulation is entered into between Plaintiffs and  
2 Google LLC (“Google”), collectively referred to as the “Parties.”

3 WHEREAS, on September 1, 2021, Plaintiffs filed the Third Amended Complaint (Dkt. No.  
4 131).

5 WHEREAS, on September 1, 2021, Plaintiffs moved to seal portions of the Third Amended  
6 Complaint on the ground that the Third Amended Complaint refers to materials designated  
7 “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order  
8 in this case (Dkt. No. 130).

9 WHEREAS, on September 1, 2021, Plaintiffs initiated challenges to Google’s  
10 confidentiality designations for the documents cited in the Third Amended Complaint that contain  
11 the material sought to be sealed.

12 WHEREAS, Google, the Designating Party, elected not to file a declaration to establish that  
13 any portion of the Third Amended Complaint should be maintained under seal pursuant to L.R. 79-  
14 5.

15 WHEREAS, Google consents to the public filing of the Third Amended Complaint in its  
16 entirety.

17 WHEREAS, Google agrees that Plaintiffs should be permitted to file the unredacted version  
18 of the Third Amended Complaint on the public docket.

19 NOW THEREFORE, the Parties stipulate:

- 20 1. Plaintiffs may file the unreacted version of the Third Amended Complaint on the public  
21 docket.
- 22 2. Plaintiffs’ confidentiality challenges, raised on September 1, 2021, will be mooted by  
23 the filing of the unredacted version of the Third Amended Complaint on the public  
24 docket.
- 25 3. Plaintiffs reserve all rights under the Protective Order (Dkt. 70), including the right to  
26 initiate subsequent confidentiality challenges to the same documents.

1 DATED: September 17, 2021

SUSMAN GODFREY LLP

2  
3 By /s/ Amanda Bonn

Amanda Bonn

4 *Counsel on behalf of Plaintiffs*

5 DATED: September 17, 2021

WILLKIE FARR & GALLAGHER, LLP

6  
7 By /s/ Eduardo E. Santacana

Eduardo E. Santacana

8 *Counsel on behalf of Google*

**ATTESTATION OF CONCURRENCE**

I am the ECF user whose ID and password are being used to file this Joint Stipulation and [Proposed] Order Permitting Plaintiffs to File the Unredacted Version of the Third Amended Complaint. Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document

Dated: September 17, 2021

By: /s/ Amanda Bonn

Amanda Bonn

*Counsel on behalf of Plaintiffs*

**[PROPOSED] ORDER**

Pursuant to stipulation of the Parties, the Court hereby **ORDERS:**

1. The motion to seal portions of the Third Amended Complaint (Dkt. 130) is denied.
2. Plaintiffs are directed to file an unredacted version of the Third Amended Complaint on the public docket within two business days of this Order.
3. This Order does not change Google's deadline to respond to the Third Amended Complaint.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_, 2021

\_\_\_\_\_  
Hon. Richard Seeborg  
Chief United States District Judge